

FILED

Jun 06 2023

Mark B. Busby
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO

ISMAIL J. RAMSEY (CABN 189820)
United States Attorney

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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 3:23-mj-70817 MAG
)	
Plaintiff,)	NOTICE OF PROCEEDINGS ON OUT-OF-
)	DISTRICT CRIMINAL CHARGES PURSUANT TO
v.)	RULES 5(c)(2) AND (3) OF THE FEDERAL
)	RULES OF CRIMINAL PROCEDURE
RACHEL CHERWITZ,)	
)	
Defendant.)	

Please take notice pursuant to Rules 5(c)(2) and (3) of the Federal Rules of Criminal Procedure that on June 6, 2023, the above-named defendant was arrested pursuant to an arrest warrant (copy attached) issued upon an

- ☒ Indictment
☐ Information
☐ Criminal Complaint
☐ Other (describe) _____

pending in the Eastern District of New York, Case Number 23-CR-146.

In that case (copy of indictment attached), the defendant is charged with a violation of Title 18 United States Code, Section 1594(b).

1 Description of Charges: Forced Labor Conspiracy in violation of Title 18, United States Code,
2 Section 1594(b); Forfeiture Allegation, Title 18, United States Code, Section 1594(d).

3 The maximum penalties are as follows:

4 Imprisonment: Maximum sentence of 20 years, 18 USC 1589(d)

5 Fine: \$250,000 , 18 U.S.C. § 3571

6 Supervised Release: 3 years, 18 U.S.C. § 3583(b)(2)

7 Special Assessment: \$100, 18 U.S.C. § 3013(a)(2)(A)

8 Forfeiture

9 Respectfully Submitted,

10 ISMAIL J. RAMSEY
11 UNITED STATES ATTORNEY

12 Date: June 6, 2023

13 /s/ _____
14 SOPHIA COOPER
15 Assistant United States Attorney
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LHE:GK/DL/JS
F.#2018R01401

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
----- X

UNITED STATES OF AMERICA

- against -

RACHEL CHERWITZ and
NICOLE DAEDONE,

Defendants.

----- X

THE GRAND JURY CHARGES:

INTRODUCTION

At all times relevant to this Indictment, unless otherwise indicated:

I. The Defendants and Relevant Entities

1. OneTaste, Inc. was a privately-held California corporation with a principal place of business in San Francisco, California. OneTaste, Inc. and several affiliated companies, including but not limited to OneTaste NYC LLC, OneTaste NY Acquisition LLC, Mirror Clan Inc., One Taste Investments LLC, One Taste Holdings LLC, OneTaste Media LLC, Caravan Retreats Inc., OTBA Inc., Texas Limbic Network LLC, and The Next Right Thing LLC (collectively, "OneTaste") operated at variously points in locations within the Eastern District of New York and elsewhere, including but not limited to Brooklyn, New York; Manhattan, New York; San Francisco, California; Los Angeles, California; Denver, Colorado; Boulder, Colorado; Austin, Texas; and London, United Kingdom.

FILED
IN CLERK'S OFFICE
US DISTRICT COURT E.D.N.Y.
* APRIL 3, 2023 *
BROOKLYN OFFICE

Judge Diane Gujarati
Magistrate Judge Robert M. Levy

INDICTMENT

Cr. No. 23-CR-146
(T. 18, U.S.C., §§ 1594(b) and 1594(d),
2 and 3551 et seq.; T. 21, U.S.C., § 853(p))

2. OneTaste promoted itself as a sexuality-focused wellness education company, which offered hands-on classes on “orgasmic meditation” (“OM”), a partnered practice typically involving the methodical stroking of a woman’s genitals for a period of fifteen minutes. OneTaste generated revenue by providing courses, coaching and events related to OM and other “wellness practices,” in exchange for a fee.

3. Individuals who associated themselves with OneTaste, either as employees, or as frequent participants in OneTaste courses and events, identified themselves as “members” of OneTaste.

4. The defendant NICOLE DAEDONE was a resident of San Francisco, California and New York, New York. DAEDONE was a co-founder of OneTaste and OneTaste’s Chief Executive Officer from approximately 2004 to 2017.

5. The defendant RACHEL CHERWITZ was a resident of San Francisco, California and New York, New York. CHERWITZ was OneTaste’s Head of Sales from approximately 2009 to 2018.

II. The Forced Labor Scheme

6. In or about and between 2006 and May 2018, the defendants, NICOLE DAEDONE and RACHEL CHERWITZ, together with others, obtained the labor and services of a group of OneTaste members by subjecting them to economic, sexual, emotional and psychological abuse; surveillance; indoctrination; and intimidation.

7. In furtherance of the scheme, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with their co-conspirators, deployed a number of abusive and manipulative tactics in order to obtain the labor and services of these members. For example, DAEDONE, CHERWITZ and their co-conspirators:

(a) intentionally recruited individuals who had suffered prior trauma to participate in OneTaste, and advertised that OneTaste's courses and teachings could heal past sexual trauma and dysfunction;

(b) induced the OneTaste members, including OneTaste employees, to incur debt, and at times facilitated the OneTaste members in opening lines of credit, to finance expensive OneTaste courses that the defendants knew the OneTaste members could not afford;

(c) subjected the OneTaste members to constant surveillance in communal homes that OneTaste oversaw. DAEDONE, CHERWITZ and their co-conspirators further directed that the OneTaste members sleep in shared assigned beds and eat, work and travel in groups, as a means of rendering the OneTaste members dependent on OneTaste for their shelter and basic necessities and limiting the OneTaste members' independence and control;

(d) demanded absolute commitment to DAEDONE, including by exalting DAEDONE's teachings and ideology, and not tolerating dissent;

(e) collected sensitive information about the OneTaste members, including but not limited to information pertaining to the OneTaste members' prior trauma, sexual histories and relationships, as a means of influencing and controlling the OneTaste members; and

(f) isolated the OneTaste members by encouraging them to limit contact with people outside of the OneTaste community, and by breaking up established romantic relationships among the OneTaste members, as a means of rendering the OneTaste members emotionally, socially and psychologically dependent on OneTaste.

8. Upon securing the allegiance of the OneTaste members through, among others, the above tactics, the defendants NICOLE DAEDONE and RACHEL CHERWITZ,

together with their co-conspirators, then engaged in abusive employment practices. For example, DAEDONE, CHERWITZ and their co-conspirators promised to pay the OneTaste members wages and commissions for work performed on behalf of OneTaste and subsequently declined to pay the OneTaste members the amounts owed, or changed the OneTaste members' employment statuses or locations without advance notice, as a means of rendering the OneTaste members dependent on OneTaste for their livelihoods and financial wellbeing.

9. As part of their employment at OneTaste, some of the OneTaste members engaged in sexual activity at the direction of the defendants NICOLE DAEDONE and RACHEL CHERWITZ. For example, DAEDONE and CHERWITZ, together with their co-conspirators, recruited and groomed OneTaste members to engage in sexual acts with OneTaste's current and prospective investors, clients, employees and beneficiaries, for the financial benefit of OneTaste and, in turn, the defendants. DAEDONE and CHERWITZ also instructed the OneTaste members to engage in sexual acts they found uncomfortable or repulsive as a requirement to obtain "freedom" and "enlightenment" and demonstrate their commitment to OneTaste and DAEDONE.

10. Resistance to the directives of the defendants was not tolerated. The defendants NICOLE DAEDONE and RACHEL CHERWITZ subjected the OneTaste members to public shame, humiliation and workplace retaliation if they failed to adhere to the defendants' directives. Moreover, the defendants and their co-conspirators employed harassment and coercion to intimidate and attack OneTaste members perceived to be enemies and critics of DAEDONE and/or OneTaste.

FORCED LABOR CONSPIRACY

11. The allegations contained in paragraphs one through ten are realleged and incorporated as if fully set forth in this paragraph.

12. In or about and between 2006 and May 2018, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendants NICOLE DAEDONE and RACHEL CHERWITZ, together with others, did knowingly and intentionally conspire to:

(a) provide and obtain the labor and services of one or more persons by means of, and by a combination of means of: (i) force, threats of force, physical restraint and threats of physical restraint to a person; (ii) serious harm and threats of serious harm to a person; (iii) the abuse and threatened abuse of law and legal process; and (iv) one or more schemes, plans, and patterns intended to cause a person to believe that, if he or she did not perform such labor and services, a person would suffer serious harm and physical restraint, contrary to Title 18, United States Code, Section 1589(a); and

(b) benefit, financially and by receiving anything of value, from participation in a venture which has engaged in the providing or obtaining of labor or services by any such means, knowing, and in reckless disregard of the fact, that said venture had engaged in the providing and obtaining of labor and services by any such means, contrary to Title 18, United States Code, Section 1589(b).

(Title 18, United States Code, Section 1594(b); Title 18, United States Code, Sections 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION

13. The United States hereby gives notice to the defendants, that, upon their conviction of the offense charged herein, the government will seek forfeiture in accordance with Title 18, United States Code, Section 1594(d) of (a) any property, real or personal, that was involved in, used, or intended to be used to commit or to facilitate the commission of such offense, and any property traceable to such property; and (b) any property, real or personal, constituting, or derived from, proceeds obtained directly or indirectly as a result of such offense, or any property traceable to such property.

14. If any of the above-described forfeitable property, as a result of any act or omission of the defendants:

- (a) cannot be located upon the exercise of due diligence;
- (b) has been transferred or sold to, or deposited with, a third party;
- (c) has been placed beyond the jurisdiction of the court;
- (d) has been substantially diminished in value; or
- (e) has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 1594(d); Title 21, United States Code, Section 853(p))

A TRUE BILL


FOREPERSON

By Carolyn Pokorny, Assistant U.S. Attorney
BREON PEACE
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F #: 2018R01401
FORM DBD-34
JUN. 85

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

RACHEL CHERWITZ and NICOLE DAEDONE,

Defendants.

INDICTMENT

(T. 18, U.S.C., §§ 1594(b), 1594(d), 2 and 3551 et seq.; T. 21, U.S.C.,
§ 853(p))

A true bill.

Deighton Reid
Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Lauren H. Elbert, Gillian Kassner, Devon Lash, Jonathan Siegel
Assistant U.S. Attorneys (718) 254-7000

UNITED STATES DISTRICT COURT

for the

Eastern District of New York

United States of America

v.

Rachel Cherwitz

Case No. 23-CR-146

Judge Diane Gujarati

Magistrate Judge Robert M. Levy

Defendant

ARREST WARRANT

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay

(name of person to be arrested) Rachel Cherwitz

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
 ☐ Probation Violation Petition
 ☐ Supervised Release Violation Petition
 ☐ Violation Notice
 ☐ Order of the Court

This offense is briefly described as follows:

Forced Labor Conspiracy, in Violation of Title 18, United States Code, Section 1594(b).

Date: 04/03/2023

City and state: Brooklyn, New York



Issuing officer's signature

Anil J. Bilson, CSMJ

Printed name and title

Return

 This warrant was received on (date) _____, and the person was arrested on (date) _____
 at (city and state) _____.

Date: _____

Arresting officer's signature

Printed name and title

**This second page contains personal identifiers provided for law-enforcement use only
and therefore should not be filed in court with the executed warrant unless under seal.**

(Not for Public Disclosure)

Name of defendant/offender: _____

Known aliases: _____

Last known residence: _____

Prior addresses to which defendant/offender may still have ties: _____

Last known employment: _____

Last known telephone numbers: _____

Place of birth: _____

Date of birth: _____

Social Security number: _____

Height: _____ Weight: _____

Sex: _____ Race: _____

Hair: _____ Eyes: _____

Scars, tattoos, other distinguishing marks: _____

History of violence, weapons, drug use: _____

Known family, friends, and other associates *(name, relation, address, phone number)*: _____

FBI number: _____

Complete description of auto: _____

Investigative agency and address: _____

Name and telephone numbers (office and cell) of pretrial services or probation officer *(if applicable)*: _____

Date of last contact with pretrial services or probation officer *(if applicable)*: _____